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16 Inc.; Hotels.com, LP; Hotel Tonight, Inc.; Hotwire, Inc.; Kayak Software Corp.;
Orbitz, LLC; Travelocity.com, LP; Fandango, Inc.; StubHub, Inc.; Ticketmaster
LLC; Live Nation Entertainment, Inc.; and Micros Systems, Inc.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

1 AMERANTH, INC.,
2

3 Plaintiff,
4

v.
5

6 ORBITZ, LLC,
7

8 Defendant.
9

Civil Action No. 12-CV-1644-JLS-NLS

[Consolidated with 3:11-CV-01810-JLS-NLS]

**DECLARATION OF YEVGENIY
KORABELNIKOV ON BEHALF OF
ORBITZ, LLC**

**FILED UNDER SEAL PURSUANT TO
PROTECTIVE ORDER – CONTAINS
INFORMATION DESIGNATED “HIGHLY
CONFIDENTIAL – ATTORNEYS’ EYES
ONLY”**

**DECLARATION OF YEVGENIY KORABELNIKOV ON BEHALF OF ORBITZ,
LLC**

10 I. **INTRODUCTION**

11 1. I serve as Technical Manager for Orbitz. I have personal knowledge of the
12 matters stated in this declaration.

13 2. I understand that the Plaintiff seeks to require Orbitz to produce all of the source
14 code and associated tools and files for the full and mobile versions of its e-commerce website
15 ("the websites"), such that the Plaintiff could set-up and execute fully-functioning versions of the
16 websites and/or full test environments for the websites.

17 3. I am offering this declaration to explain:

18 a. the effort Orbitz's employees would have to undertake to gather some of
19 the materials requested;

20 b. why it would be difficult or impossible for Orbitz to provide some of the
21 materials requested;

22 c. why it would be difficult or impossible to set-up fully-functioning versions
23 of the websites and/or full test environments at the Plaintiff's location; and

24 d. what Orbitz proposes as a more reasonable source code production in this
25 matter.

II. DETAILED DISCUSSION

A horizontal bar chart illustrating the percentage of respondents who have heard of various topics. The y-axis lists ten topics, numbered 1 through 10. The x-axis represents the percentage of respondents, ranging from 0% to 100% in increments of 10%. Each topic has a corresponding black horizontal bar. Most topics show 100% awareness, while a few topics like 'The concept of AI' and 'Machine learning' show lower awareness rates.

Topic	Percentage (%)
1	~95
2	100
3	100
4	100
5	~95
6	~95
7	~95
8	~95
9	~95
10	~95
The concept of AI	~75
Machine learning	~75

Category	Count
1	~450
2	~350
3	~150
6	~150
0	~100
12	~100
4	~50
5	~50
7	~50
8	~50
9	~50

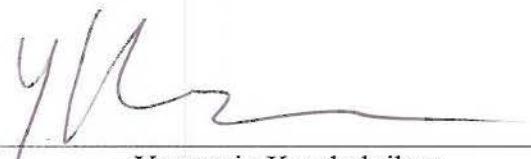
1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

C. What Orbitz Proposes as a More Reasonable Source Code Production

10. In the previous patent infringement cases in which Orbitz was a defendant, Orbitz
11 was only required to produce the specific source code related to the functionality the plaintiff
12 identified in its infringement contentions. If a similar source code production requirement is
13 imposed in this case, it will be much more feasible for Orbitz to meet that requirement than it
14 would be for Orbitz to meet the requirement that the Plaintiff is seeking to have imposed.

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20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct.

22
23 Executed on January 10th, 2013, at Chicago, Illinois.

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26 
27
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Yevgeniy Korabelnikov